

EXHIBIT AI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KATHLEEN ASHTON, as Administrator
of the Estate of Thomas Ashton, Deceased
and on behalf of all survivors of Thomas Ashton;

**THIRD AMENDED
CONSOLIDATED
MASTER COMPLAINT**

JOSEPHINE ALGER and FREDERICK ALGER, as Co-
Executors of the Estate of David D. Alger, Deceased
and on behalf of all of survivors of David D. Alger;

02 CV 6977(RCC)

ANGELICA ALLEN, as Administrator
of the Estate of Eric Allen, Deceased
and on behalf of all survivors of Eric Allen;

Kreindler & Kreindler LLP

GEORGE ANDRUCKI and MARY ANDRUCKI, as co-
Administrators of the Estate of Jean Andrucki, Deceased
and on behalf of all survivors of Jean Andrucki;

ALEXANDER PAUL ARANYOS and
WINIFRED ARANYOS, as co-Administrators
of the Estate of Patrick Michael Aranyos, Deceased
and on behalf of all survivors of Patrick Michael Aranyos;

MARGARET ARCE, as Administrator
of the Estate of David Gregory Arce, Deceased
and on behalf of all survivors of David Gregory Arce;

VICKIE ROSE ARESTEGUI, as Legal Representative
of the Estate of Barbara Jean Aretegui, Deceased
and on behalf of all survivors of Barbara Jean Aretegui;

MARGIT ARIAS, as Administrator
of the Estate of Adam Peter Arias, Deceased,
and on behalf of all survivors of Adam Peter Arias;

EVELYN ARON, as Executor
of the Estate of Jack Charles Aron, Deceased
and on behalf of all survivors of Jack Charles Aron;

NANCY BADAGLIACCA, as Administrator
of the Estate of John J. Badagliacca, Deceased
and on behalf of all survivors of John J. Badagliacca;

15 nations in guerrilla warfare, terrorist activities, rocket warfare, demolition and bombing, including the use of mines, grenades, TNT, nitroglycerine and plastic explosives. Classes were also given in "how to kill a policeman" and "traps, murder and terrorist moves."

115. On August 23, 1996, a strengthened BIN LADEN issued a fatwa declaring a jihad against Americans present in Muslim lands. The message was disseminated throughout all AL QAEDA cells and associated terrorist groups, such as the EGYPTIAN ISLAMIC JIHAD. The London AL QAEDA cell, run by KHALID AL FAWAZ under the name ADVICE AND REFORMATION COMMITTEE, and the Egyptian cell, run by AL ZAWAHIRI and Abdel Barrry, were used to send the fatwa to Muslims living in the Western World. WADIH EL HAGE was also used by BIN LADEN to deliver messages, money and terrorist material to AL QAEDA operatives in the U.S. and U.K. AHMAD SA'ID AL KADR an Egyptian-born aide to BIN LADEN was an associate of defendant AYMAN ZAWAHIRI when he was charged with the 1995 bombing of the Egyptian embassy in Islamabad, Pakistan in which 16 people were killed. AL KADR was running the Afghanistan operations of the Canadian charity, Human Concern International Society, and sending money to support AL QAEDA.

IRAQI AND AL QAEDA INTERESTS PUBLICLY MERGE

116. In February 1997, BIN LADEN publicly expressed his support for IRAQ in its conflict with the United States stating:

cooperation between WAMY and AL QAEDA.

445. Another manual found in Ahmed Ajaj's possession was hate literature against Americans, Christians, and Jews. This encyclopedia, which glorified the hijacking of busses and the killing of innocent civilians in Israel, was published by WAMY.

THE SAUDI HIGH COMMISSION

446. THE SAUDI HIGH COMMISSION, (a/k/a the Saudi High Relief Commission) (or "SHC") was founded in 1993 by PRINCE SALMAN IBN ABDUL AZIZ (or "PRINCE SALMAN"), the Mayor of Riyadh and a son of King Fahd, and a prime supporter of the charity. Hailed as the largest fundraising effort in the Arab and Muslim world, the SAUDI HIGH COMMISSION claims to have spent more than \$600 million in aid to Bosnian Muslims impoverished by the country's recent civil war.

447. SHC has been widely criticized by aid agencies and Bosnian intellectuals for importing the extreme form of Saudi Islam, Wahhabism, which is alien to the more moderate, secular form of Islam found in Bosnia. Bosnian officials claim that the Wahhabis' intolerant and anti-Western form of Islam contradicts and offends Bosnian tradition and undermines the country's rich and diverse religious heritage.

448. On October 21, 2001, five Algerians were arrested in Bosnia Herzegovina on criminal charges of international terrorism following a threat to the United States embassy. The incident resulted in the five day closure of the United States and British embassies for what both embassies called "a credible security threat." The plot was

(f) Count Six - Anti Terrorism and Effective Death Penalty Act Claim, 28 U.S.C. § 1605(a)(7) – Defendants IRAQ, IRAQI INTELLIGENCE and the TALIBAN the total sum of FIFTY MILLION (\$50,000,000) DOLLARS for each plaintiff;

(g) Count Seven - Punitive Damages the total sum of THREE HUNDRED MILLION (\$300,000,000) DOLLARS for each plaintiff; and

(h) Count Eight - Property damage the total sum of ONE HUNDRED MILLION (\$100,000,000.00) DOLLARS for each plaintiff.

plus interests, costs and attorneys fees.

Dated: New York, New York
September 5, 2003

KREINDLER & KREINDLER
Plaintiffs Liaison Counsel

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